

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**IN RE:**

**JIMMY RAY LEWIS, JR.  
DORINA JOY LEWIS  
DEBTOR(S)**

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§

**CASE NO. 24-50029-MMP  
CHAPTER 11**

**OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Comes now Kubota Credit Corporation (hereinafter referred to as "KCC"), a secured creditor in the above-entitled and numbered case, filing this its Objection to Confirmation of Chapter 11 Plan, and in support hereof represents:

1. The above-styled Debtor(s) filed a voluntary petition under Chapter 11 of Title 11, United States Bankruptcy Code, on January 4, 2024.
2. Debtor(s) is indebted to KCC pursuant to a Retail Installment Contract and Security Agreement (the "Agreement") that is secured by a properly perfected security interest in Motor Vehicle Lien described as a LOFTNESS 61BSLP60DP, VIN: 93-820 (the "Collateral").
3. KCC filed its proof of claim in the amount of \$21,691.40, with pre-petition arrearage of \$1,721.53 (the "Claim").
4. Debtor(s) Chapter 13 Plan (the "Plan") schedules the amount of the Claim at \$21,691.40, values the Collateral at \$10,000.00, and proposes repayment at an interest rate of 10.35% over the life of the Plan.
5. KCC objects to confirmation of the Plan because it understates the value of the Collateral. KCC states the current value of the Collateral is \$14,552.87 based on market data and depreciation. The collateral was sold brand new for \$22,359.00 on May 2, 2023.

WHEREFORE, PREMISES CONSIDERED, KCC prays that this Court deny confirmation of the Plan and grant it such other and further relief at law and in equity as is just.

Respectfully submitted,  
Bonial & Associates, P.C.

/s/ Chandra D. Pryor

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served upon the following parties in interest either via pre-paid regular U.S. Mail or via electronic notification on or before the 18th day of April 2024:

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24-50029-MMP

/s/ Chandra D. Pryor \_\_\_\_\_  
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